

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MARINER HEALTH CENTRAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10877 (LSS)

(Jointly Administered)

**DECLARATION OF MARK FULCHINO
IN SUPPORT OF VENUE IN DELAWARE**

I, Mark Fulchino, hereby declare as follows:

1. I am the Chief Executive Officer of Fundamental Administrative Services, LLC (“FAS”), a creditor and contract counterparty to Mariner Health Central, Inc. (“**Mariner Central**”).

2. I make this declaration on behalf of FAS in support of the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) and their opposition to the pending motion to transfer venue of these bankruptcy cases from Delaware to Oakland.

3. FAS provides various administrative support services as a subcontractor of Mariner Central to its affiliated skilled nursing facilities.

4. FAS is based in Maryland and has no employees or operations in California. It would be vastly more convenient for FAS to participate as a creditor in the Debtors’ bankruptcy cases in Delaware as opposed to in Oakland.

5. Further, it is possible that the services provided by FAS under its subcontracting agreement with Mariner Central may become relevant to the Debtors’ bankruptcy cases. For

¹ The Debtors, along with the last four digits of each Debtor’s tax identification number, are Mariner Health Central, Inc. (6203), Parkview Holding Company GP, LLC (1536), and Parkview Operating Company, LP (7273). The Debtors’ headquarters are located at 3060 Mercer University Drive, Suite 200, Atlanta, GA 30341.

example, FAS provides accounting services for each of the Debtors and maintains their books and records onsite at FAS in Maryland. I note that the contract between FAS and Mariner Central is governed by Maryland law and provides for venue in Baltimore, Maryland. At best it would be highly inconvenient to address such issues in Oakland. Any such issues would be vastly more economical, convenient, and efficient to be dealt with in Delaware.

6. Accordingly, FAS supports venue for the Debtors' bankruptcy cases in Delaware.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on: October 18, 2022

By:



Mark Fulchino
Chief Executive Officer
Fundamental Administrative Services, LLC